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U. S. Department of Transportation
Docket Management System
400 7th Street, S.W.
Room PL 401
Washington, DC 20591-0001

January 17, 2003

RE: Application for temporary exemption

Dear Sir or Madam:

Air Transport International, LLC, a 14 CFR Part 121 Supplemental Air Carrier, certificate number IXXA544T, respectfully requests an expedited review and response authorizing temporary exemption from Federal Airworthiness Regulation 14 CFR Part 121.313 (j). Specifically, ATI requests an additional 6 months, ending October 9, 2003, to procure a solution authorized under Supplemental Type Certificate for implementation on our DC-8 aircraft because as of the date of this request, there are no approved Supplemental Type Certificates approving technical data for the installation of a cockpit door that would conform to the mandates presented under 14 CFR Part 121.313 (j).

At present ATI has applied and been approved for supplemental funding by the FAA for the purpose of implementing security enhancements as defined under 14 CFR Part 121.313 (j). This agreement, No.: DTFA01-03-A-00040, identifies the roles and responsibilities of Air Transport International, LLC and those of the Federal Aviation Administration in addition to program milestones, progress & budgetary reporting, a description of the effort and technical direction.

Although ATI has sought to comply with 14 CFR Part 121.313 (j) in an expeditious timeframe, we have been limited by a lack of approved technical data. However, ATI has contracted the only known vendor seeking a DC-8 solution for this requirement - National Aircraft Service Inc. (NASI) - to provide an approved cockpit door system that meets or exceeds the requirements of the aforementioned airworthiness regulation. Currently, NASI has applied for STC with the Chicago ACO and received project number ST4118CH-T. ATI does not control the development/manufacturing of any technical documentation or kit components defined within the NASI application for STC. I, as the EASP Program Manager for ATI, have been informed by NASI that all required testing has been completed in accordance with FAA guidance and submitted to the Chicago ACO, the NASI application for final review and STC issuance. NASI has committed to a delivery date of February 14, 2003 for a quantity of 10 enhanced security cockpit door assemblies and their associated installation kits, provided the FAA approves and issues the STC in accordance with their application. Final delivery of 10 door assemblies and installation kits are tentatively scheduled for March 14, 2003.

Following receivership of enhanced security cockpit door assemblies and necessary provisions; ATI intends to start conformity operations. At present ATI is soliciting quotations for services as required in the NASI Cockpit Door System Installation Manual FDS-16. The closing date for perspective vendors ends at 1600 CST, Friday, January 31, 2003. The selection of an installation vendor will be made at that time. ATI has required that any vendor submitting a qualified bid must make every effort to complete installations on the ATI DC-8 fleet totaling 18 aircraft, no later than 1600 CST, April 8, 2003. That said, with no approved technical data and the diminishing of reasonable time necessary to perform these modifications, ATI is petitioning the Administrator for a six month temporary exemption as authorized under regulations governing the rulemaking process found in Part 11 of Title 14, Code of Federal Regulations (CFR) via submission of this document.

Due to the global contractual commitment of certain airframes within the ATI fleet of DC-8 aircraft, we furthermore specifically request to exercise exemption privileges outside the United States of America. This request is primarily predicated on the fact that ATI supports the United States Department of Defense via contract under management with the Air Mobility Command. Any further information relative to this line of business and/or its operations should be addressed to Mr. Tom Fosko, Director of Safety & Security for ATI; or, the United States Air Force Air Mobility Command.

ATI currently complies with requirements as issued under SFAR 92-3. These requirements provide a security enhancement to the type certificated flightdeck compartment door. This measure has proven effective in limiting access to the flight compartment to only those personnel properly authorized. Additionally, the scope of ATI's domestic operations is in support of freight forwarders and logistics providers. That said the vast majority of ATI's domestic flights are that of scheduled cargo operations where only flight crew and airline approved personnel only are permitted aboard. Therefore, FAA mandated and monitored security provisions limit access to the aircraft to only those company personnel who have properly and successfully passed background and finger print screening; and, have a reasonable necessity for access to the aircraft in support of the safe maintenance and operation of company airframes.

In conclusion, although the FAA may grant ATI a temporary exemption from conformity with 14 CFR Part 121.313 (j) of six months, ATI will make every effort to complete the modifications required by this ruling as soon as possible. Furthermore, ATI believes that it is reasonable conclude that no aircraft, flight crew or civilian personnel or assets would be adversely affected or jeopardized by approval of this petition for temporary exemption. Further ATI believes that its current levels of security coupled with the nature and scope of ATI's operations provide a level at least comparable to that afforded under 14 CFR Part 121.313 (j). Therefore, ATI feels that it is in the interest of the public in addition to the interests of national security and logistical requirements to grant temporary exemption to Air Transport International, LLC for a period of six months, ending October 9, 2003.

Your support and assistance is greatly appreciated in advance. Should I or any member of my team be able to provide additional information on this or any other issue, please do not hesitate to contact me by the use of the below listed means.

Respectfully Submitted,

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